

### REMARKS

Reconsideration and allowance of the subject application in view of the foregoing amendments and the following remarks is respectfully requested.

In this submission, claims 3 and 8 have been cancelled thus rendering the claim duplication issue moot. The remaining claims have been amended in a manner which obviates the claim objections and clarifies the subject matter for which patent protection is sought. The amendments are also submitted as obviating the rejection of claims 5-6 and 12-13 under 35 USC § 101 by making it clear that there is a definite machine/computer hardware nexus and that the claims are not directed to software alone.

The rejection of claims 1, 4-6 and 9-13 under 35 USC § 103(a) as being unpatentable over DeAngelo in view of SematicEdge is, to the degree that it is still pertinent to the claims as amended, respectfully traversed.

The traverse advanced in the last filed response is reiterated. As to the position taken by the Examiner in connection with the Applicants assertion that DeAngelo discloses a plurality of containers whereas the claimed subject matter calls for a single container, the Examiner's reference to "single container" at column 17, lines 10-12 is not well taken. What is disclosed is a single one of a plurality of containers being singled out for a given storage use. That is to say, this section of the reference is such as to set forth:

. . . When input is received from the user choosing "select component" (to select the component to containerize) from the main menu bar 10700, a window appears allowing the user to select any file, **component, or other container**. If for example, the user were creating a **warehouse container**, and wishes to incorporate several databases into that container, input would then be received from the user selecting "database." The program would prompt the user for

the location (directory) of that database or container. If the requested selection is not containerized, input may then be received from the user choosing to containerize the element at that time, after which the program returns to "select component." Once input is received from the user defining the database location, the program logically encases the directory or directories in the defined container. **The above procedure may be repeated as many times as desired to include multiple databases within a single container.** While logical simplicity would dictate that **all containers within a container** be of the same subset, it would be possible for input to be received from the user **choosing containers** of any subset to include in the container. When input is received from the user choosing "finished," the container is created with a unique network identity, preferably through some combination of exact time and digital device serial number, or centralized numbering system, or other means. The container 100 contains all digital code, including data and program software from the selected items or **containers**. (Emphasis added)

It is therefore clear that the DeAngelo reference does not suggest the use of a single container in the manner intimated by the Examiner but merely indicates that a number of databases can be stored in each of one or more of the plurality of containers.

Further, an electronic search of this document has revealed a total dearth of the term "tier" which therefore must cast doubt on whether it can be relied upon to actually suggest the formation of a 4-tier architecture as claimed. Indeed, the Examiner's reference to Fig. 2B is not understood as it is merely a schematic diagram and the manner in which the "tiers", if there are any, are arranged, is not clear.

More specifically, DeAngelo is asserted to teach the invention substantially as claimed but is admitted to not explicitly teach creating a person-system interaction container (PSIC) for interaction by using the representations to construct, adapt and manipulate knowledge bases constituting a structured representation of a context of use of the user-system, and establishing, with aid of this structured representation, a dialog between users and the services of the application wherein all user system communications between the user interface and functions of the application are managed by the person-system interaction container, and wherein interaction services implemented by the person-system interaction container use one at least of the following knowledge bases: a domain of application, an application, a user or users, a task, and modes of perception and of action offered by the terminal.

To overcome these numerous shortcomings the rejection turns to SematicEdge, GmbH teaches creating a person-system interaction container (PSIC) for interaction by using representations to construct, adapt and manipulate knowledge bases constituting a structured representation of a context of use of the user-system and establishing with aid of this structured representation, a dialog between users and the services of the application wherein all communications between the user interface and functions of the application are managed by the person-system interaction container, and wherein interaction services implemented by the person-system interaction container use one at least of the following knowledge bases: a domain of application, an application, a user or users, a task, and modes of perception and of action offered by the terminal.

The rejection then goes on to assert that it would have been obvious to a person of ordinary skill in the art at the time the invention was made to modify De Angelo's system with SematicEdge, GmbH 's teachings because in the end it would increase the efficiency of the De Angelo's system by providing an information gathering phase, before a user can talk directly with a human call center operator, especially when all the lines are busy.

However, if all of the lines are busy how can the user talk to anybody and how is the efficiency raised under such conditions? This position seems to be self-defeating

and it is not seen that the hypothetical person of ordinary skill would be motivated in the manner purported in this rejection.

**Conclusion**

All objections and rejections having been addressed, it is respectfully submitted that the application is in condition for allowance and a Notice to that effect is earnestly solicited.

The Examiner is invited to telephone the undersigned, Applicant's attorney of record, to facilitate advancement of the present application.

To the extent necessary, a petition for an extension of time under 37 C.F.R. 1.136 is hereby made. Please charge any shortage in fees due in connection with the filing of this paper, including extension of time fees, to Deposit Account 07-1337 and please credit any excess fees to such deposit account.

Respectfully submitted,

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**Date: January 18, 2011**  
**KMB/KJT/bjs**